

From: Scott.Miller@deq.idaho.gov
Sent: Tuesday, December 10, 2013 10:29 AM
To: Rochlin, Kevin
Cc: Douglas.Tanner@deq.idaho.gov
Subject: DEQ Comments on the Gamma Cap Performance Report FMC OU
Attachments: DEQ Cmmnt Gamma Cap Performance rpt..docx.docx

Categories: 11-19 to 1-10 2014

Kevin,

Please find attached DEQ's comments on the November 2013 Gamma Cap Performance Evaluation Report of the FMC OU.

Let me know if you have any questions. It should be fine if you submitted these comments to FMC as EPA's.

Doug let me know if you have any objections with EPA submitting our comments under their cover.

TO: KEVIN ROCHLIN, EPA
FROM: SCOTT A. MILLER, IDEQ
SUBJECT: DEQ COMMENTS ON THE NOVEMBER 2013 GAMMA CAP
PERFORMANCE EVALUATION REPORT FOR THE FMC OU
DATE: DECEMBER 10, 2013
CC: DOUG TANNER, IDEQ

SPECIFIC COMMENTS

1. Section 1.2, paragraph 3, page 1-2; the text appears to state performance verification of the final gamma and ET caps will be based on construction methods and construction QA/QC and will not rely on direct gamma measurements. If this is correct please provide reference to where this was agreed. Verification of the final cap construction should include direct gamma measurements.
2. Section 3.1, paragraph 4, line 1, page 3-1; please indicate whether the measurements made on uncovered slag were shielded or unshielded.
3. Section 4.2, page 4-1; the conclusions presented in this section concerning the statistical significance between Configurations 1 and 5 and Configurations 3 and 4 are not reproducible from the data provided in Table 3.2. Please provide the data used in the statistical analysis and Minitab output files as an Appendix in this report.